

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

PATRICIA THOMPSON, as personal representative of the ESTATE OF MARCONIA LYNN KESSEE,

Plaintiff,

v.

NORMAN REGIONAL HOSPITAL AUTHORITY d/b/a NORMAN REGIONAL HOSPITAL, et. al.

Defendants.

Case No. CIV-19-113-SLP

**PLAINTIFF'S AMENDED RULE 30(b)(6) NOTICE TO TAKE
VIDEO DEPOSITION OF TURN KEY HEALTH CLINICS, LLC
REPRESENTATIVES**

TO: Turn Key Health Clinics, LLC
c/o Paulina Thompson, Esq.
Sean P. Snider, Esq.
Johnson, Hanan and Vosler
Hawthorne & Snider
9801 N. Broadway
Extension Oklahoma City,
OK 73114

PLEASE TAKE NOTICE that on February 8, 2021, at 9:00 a.m., at the offices of Instascript, located at 125 Park Ave, Suite LL, Oklahoma City, OK 73102, pursuant to Rule 30(b)(6), the Plaintiff, Patricia Thompson, as Personal Representative of the Estate of Marconia Kessee, deceased, by and through her attorneys of record will take the video deposition upon oral examination of one or more officers, directors, or managing agents designated by Turn Key Health Clinics, LLC, or other persons who consent to testify on

its behalf regarding the:

- 1. Terms of Turn Key Health Clinics, LLC's contractual agreement with Cleveland County and/or the Cleveland County Detention Center from January 16, 2017 – March 1, 2018;**
- 2. Policies, procedures and practices of Turn Key Health Clinics, LLC related to duties under the contract as it relates to the medical care of inmates/detainees from January 16, 2017 – March 1, 2018;**
- 3. Policies, procedures and practices of Turn Key Health Clinics, LLC related to hiring, training and supervision of its personnel and Cleveland County Detention Center personnel for duties under the contract as it relates to the medical care of inmates/detainees from January 16, 2017 – March 1, 2018;**
- 4. Day-to-day medical implementation by medical personnel of policies, procedures and practices of Turn Key Health Clinics, LLC related to duties under the contract as it relates to the medical care of inmates/detainees from January 16, 2017 – March 1, 2018.** (This will need to be someone knowledgeable enough to talk about the Turn Key's corporate policies, practices, supervision and control of the actual medical treatment rendered by Turn Key employees or other personnel under Turn Key's supervision and/or control. A refusal to answer a question under this topic based on a lack of medical knowledge, training, credentials or

understanding of Turn Key's day-to-day medical operation will be insufficient.);

5. **When and how Turn Key Health Clinic, LLC's medical personnel and other non-medical personnel (including Cleveland County Detention Center employees) use critical care observation and/or medical observation related to duties under the contract as it relates to the medical care of inmates/detainees.** (This will need to be someone knowledgeable enough to talk about the Turn Key's corporate policies, practices, supervision and control of the actual medical treatment rendered by Turn Key employees or other personnel under Turn Key's supervision and/or control. A refusal to answer a question under this topic based on a lack of medical knowledge, training, credentials or understanding of Turn Key's day-to-day medical operation will be insufficient.);
6. **Coordination of duties and responsibilities between Turn Key Health Clinic, LLC personnel and Cleveland County Detention Center employees as it relates to the medical care of inmates/detainees, i.e., whose responsibility is it to do specific tasks related to the medical care of inmates/detainees from January 16, 2017 – March 1, 2018;**
7. **Whether the intake process and medical treatment provided to Marconia Kessee met Turn Key Health Clinic, LLC's standards for the medical care of inmates/detainees.** (This will need to be someone

knowledgeable enough to talk about the Turn Key's corporate policies, practices, supervision and control of the actual medical treatment rendered by Turn Key employees or other personnel under Turn Key's supervision and/or control. A refusal to answer a question under this topic based on a lack of medical knowledge, training, credentials or understanding of Turn Key's day-to-day medical operation will be insufficient.);

This deposition shall be taken before an officer authorized to administer oaths by the law of the State of Oklahoma at the offices of Instascript, located at 125 Park Ave, Suite LL, Oklahoma City, OK 73102, on February 8, 2021, at 9:00 a.m., and the taking of the same will be adjourned and continued from day to day at the same time and place until completed. The deposition shall also be recorded by audio/visual means.

Dated this 28th day of January 2021.

Respectfully submitted,
S/ CHRIS HAMMONS
Chris Hammons, OBA #20233
Jason Hicks, OBA# 22176
Jonathan Ortwein, OBA#32092
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2021, I filed the attached document with the Clerk of Court. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.

s/ CHRIS HAMMONS